

**February 2009**

**Certification of CPNI Filing**

**EB-06-TC-060**

**EB Docket No. 06-36**

**ANNUAL CERTIFICATION**  
**Customer Proprietary Network Information Procedures of**  
**Totah Communications, Inc.**

I, Mark Gailey, do hereby certify that I have personal knowledge that Totah Communications, Inc. ("Totah") has established procedures regarding the Customer Proprietary Network Information related to the subscribers of Totah. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: \_\_\_\_\_

By:  Mark Gailey  
President & General Manager  
Totah Communications, Inc.

**February 2009**

**Certification of CPNI Filing  
Totah Communications, Inc.**

Totah Communications, Inc. ("Totah") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Totah certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009 and does not sell or disclose subscriber CPNI to outside entities. In addition Totah does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

Totah's employees have been educated about CPNI as well as the related federal regulations and Totah's statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket #06-36**

**Annual 64.2009(e) CPNI Certification for 2008**

**Date filed:** Monday, February 23<sup>rd</sup>, 2009

**Name of company covered by this certification:** Totah Communications, Inc.

**Form 499 Filer ID:** 807999

**Name of signatory:** Mark Gailey

**Title of signatory:** President & General Manager

I, Mark Gailey, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

**Signed:**  \_\_\_\_\_

**Print Name:** Mark Gailey

**Title:** President & General Manager  
Totah Communications, Inc.

**Date:** Friday, February 20<sup>th</sup>, 2009

## Statement of Compliance with the FCC's Customer Proprietary Network Information "CPNI" Rules and Regulations

Totah Communications, Inc.'s ("Totah") operating procedures certify that Totah is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Totah's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009.

Totah has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

Any employee that violates Totah's CPNI operating procedures is subject to disciplinary action, up to dismissal.

Totah mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.

Totah has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

**Totah Communications, Inc. has not taken any actions against data brokers in the past year regarding any breach of CPNI information.**

**Totah Communications, Inc. has not received any customer complaints in the past year concerning the unauthorized release of CPNI.**